

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC,)
etc., et al.,)
)
)
Plaintiffs,)
)
)
v.) Case No.
) 05-03639 JW
GOOGLE, INC.,)
)
)
Defendant.)
)

30(b) (6) DEPOSITION OF BRETT R. HANSON

August 18, 2006

228010

BARKLEY
Court Reporters

(310) 207.8000	Los Angeles	(916) 922.5777	Sacramento	(818) 702.0202	San Fernando Valley
(949) 955.0400	Orange County	(408) 885.0550	San Jose	(858) 455.5444	San Diego
(415) 433.5777	San Francisco	(951) 686.0606	Inland Empire	(760) 322.2240	Palm Springs

B. Hanson

1 proprietorship, have you otherwise placed any
2 advertisements with Google for yourself?
3
4 A. Not that I can recall.
5
6 Q. And with respect to Industrial
7 Printing, when did Industrial Printing first
8 start to do business with Google?
9
10 A. I think it was on or about
11 July 2002.
12
13 Q. And prior to that time, had you
14 had -- pardon me. Prior to that time, had
15 you used any other on-line advertising other
16 than Google?
17
18 MR. LEVY: Could you tell me who
19 "you" is?
20
21 MR. BIDERMAN: The sole
22 proprietorship and Industrial Printing.
23
24 MR. LEVY: You're asking did
25 Industrial Printing use another
26 service?
27
28 MR. BIDERMAN: Yes.
29
30 Q. Yahoo, Overture?
31
32 A. Could you ask the question
33 again, please.
34
35 Q. Sure. Prior to starting to do

1 B. Hanson

10:05 2 business with Google, had industrial printing

10:05 3 used any other on-line advertising services?

10:05 4 A. Yes, sir.

10:05 5 Q. What were those?

10:05 6 A. The ones I can recall are Yahoo,

10:05 7 which was Overture, Ah-Ha. I think that may

10:05 8 have been the extent of the -- the extent of

10:05 9 them that I can recall.

10:05 10 Q. Okay. And what type of business

10:05 11 is Industrial Printing engaged in?

10:05 12 A. Printing services.

10:05 13 Q. What type of printing services?

10:05 14 A. Printing on three-dimensional

10:05 15 substrates.

10:05 16 Q. And is that the same type of

10:05 17 business that Hanson Industries is engaged

10:06 18 in?

10:06 19 A. I'm not sure of the full extent

10:06 20 of what Hanson Industries does.

10:06 21 Q. Does Hanson Industries do

10:06 22 printing on three-dimensional substrates?

10:06 23 A. I'm not sure if they do at this

10:06 24 point.

10:06 25 Q. And how about CLRB Hanson, does

1 B. Hanson

11:00 2 with a daily budget of \$50 for Industrial

11:00 3 Printing. Has that daily budget changed?

11:00 4 A. I believe you have the records.

11:00 5 Yes.

11:00 6 Q. And how often has it changed?

11:00 7 A. Sometimes change it three, four

11:00 8 times a day.

11:00 9 Q. And what has it varied from?

11:00 10 A. Zero, turning off the campaign,

11:00 11 suspending the campaign, to from -- to answer

11:00 12 your specific question, zero to I think it's

11:00 13 been as high as \$2,000 a day.

11:01 14 Q. And what causes you to change

11:01 15 your daily budget?

11:01 16 A. Our -- our web logs that track

11:01 17 traffic in correlation with the orders.

11:01 18 Certain times of day. Certain days of the

11:01 19 week. Certain keywords. Whether we're going

11:01 20 to continue in how the traffic is coming in

11:01 21 from -- from MSN or Yahoo in correlation with

11:01 22 our web logs and how that ties in. We've got

11:01 23 a formula that we look at.

11:01 24 Q. And because you advertise on MSN

11:01 25 and Yahoo also; is that correct?

1 B. Hanson

2 A. Yes, sir.

3 Q. And other than MSN, Yahoo and

4 Google, any other on-line advertising that

5 you've used on behalf of Industrial Printing

6 or CLRB Hanson?

7 A. Industrybrains.com. Super

8 Pages, Verizon Super Pages. Mama, M-A-M-A,

9 dot com. Request. That's a pay per

0 impression.

1 MR. BIDERMAN: Did you get the

2 name?

3 THE REPORTER: Yes.

4 A. That's what I can recall.

5 Q. Then I'll show you as exhibit

6 next in order, Exhibit 24, which are -- is

7 Exhibit A1 to the complaint or amended

8 complaint in this case.

9 (Discussion off the record.)

0 (Exhibit No. 24, Exhibit A1 to

1 the amended complaint in this case,

2 marked for identification as of this

3 date.)

4 Q. Exhibit 24 are, as I

5 represented, exhibits to the amended

1 C E R T I F I C A T E

2 STATE OF NEW YORK)

3 :SS

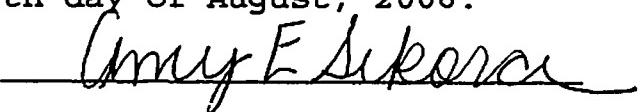
4 COUNTY OF NEW YORK)

5 I, AMY E. SIKORA, CRR, CSR, RPR, a
6 Certified Realtime Reporter, Certified
7 Shorthand Reporter, Registered Professional
8 Reporter and Notary Public within and for the
9 State of New York, do hereby certify that the
10 foregoing deposition of BRETT R. HANSON was
11 taken before me on the 18th day of August, 2006;

12 That the said witness was duly
13 sworn before the commencement of the testimony;
14 that the said testimony was taken
15 stenographically by me and then transcribed.

16 I further certify that I am not
17 related by blood or marriage to any of the
18 parties to this action nor interested directly
19 or indirectly in the matter in controversy; nor
20 am I in the employ of any of the counsel in
21 this action.

22 IN WITNESS WHEREOF, I have hereunto
23 set my hand this 29th day of August, 2006.

24 
25

AMY E. SIKORA, CRR,